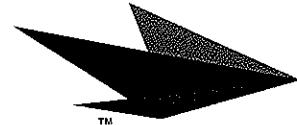


Voice | Data | Internet | Wireless | Entertainment



EMBARQTM

Embarq Corporation
EMBARQ.com

*William E. Hendricks
Attorney for Embarq Corporation
902 Wasco Street
Hood River, OR 97031*

May 25, 2006

Andy Pollock
Executive Director
Nebraska Public Service Commission
1200 N Street, Suite 300, Lincoln, NE 68508

Re: Application No. NUSF-35/PI-69; Embarq Corporation's Initial
Comments

Dear Mr. Pollock:

Please accept for filing an original and five copies of Embarq Corporation's Initial Comments in this matter. Please do not hesitate to contact me or Jim Roberts, at (651) 222-0951, if you have any questions or concerns.

Sincerely,

William E. Hendricks

WEH/sm
Enclosure

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission seeking to)	Application No. NUSF-35/PI-69
determine Nebraska Eligible)	
Telecommunications Carrier status for the)	Progression Order No. 1
purposes of receiving state universal)	
services and Telehealth services to rural)	Comments of Embarq Corporation
hospitals)	

COMMENTS OF EMBARQ CORPORATION

Embarq Corporation, on behalf of United Telephone Company of the West d/b/a Embarq, respectfully submits these comments in response to the questions set forth in the Commission's Progression Order No. 1 in this docket, entered into on March 29, 2006.

In this Progression Order, the Commission seeks comments on the propriety of designating all carriers granted federal Eligible Telecommunications Carrier ("ETC") status as Nebraska Eligible Telecommunications Carriers ("NETCs") solely for the purpose of receiving Nebraska Telephone Assistance Program ("NTAP") support for qualifying customers. Embarq appreciates the opportunity to provide these comments.

The order requesting comments in this proceeding did not state the Commission's goals. Without this information, it is difficult for Embarq to offer specific comments. Embarq, however, provides the following comments to generally address the Commission's questions.

On June 28, 2005 the Commission, in Application No. C-3415, adopted interim guidelines for ETC designation. These guidelines establish the standards by which carriers seeking ETC status are to be evaluated, and also establish annual reporting requirements for existing ETCs to continue receiving federal USF support. These standards are quite rigorous, requiring detailed reports and documentation on a number of items. Embarq does not understand why the Commission would now, less than a year later, loosen the guidelines to allow newly designated federal ETCs in the state of Nebraska to automatically become an NETC solely for the purpose of receiving NTAP support.

Embarq fully supports this Commission's goal of making telephone service available to as many low income Nebraska consumers as possible. Assuming that the Commission's intent in this proceeding is to allow low income consumers to reap the benefits of competition, Embarq also supports this desire. The NTAP program allows many low income Nebraskans to obtain telephone service that they would not have been able to afford otherwise. However, the goal of allowing low income consumers to benefit from competition should not dictate the process by which carriers are designated as an NETC, particularly when the Commission has previously chosen to make the process more rigorous.

All low income Nebraskans currently have access to low cost telephone service through the NTAP program. At least one carrier in each exchange is an NETC and

offers service through the NTAP program. Embarq has not seen any evidence that allowing all ETCs to become an NETC for the purpose of receiving NTAP support will promote competition for low income consumers. In addition, competition is already occurring in most areas of the state, and the benefits of that competition accrue to all consumers, including low income consumers.

Respectfully submitted this 29th day of May, 2006.

By: 

William E. Hendricks

Attorney for Embarq Corporation